Columbia and Snake TMDL Project Proposal
April 2008

Proposal

Develop a TMDL for the Columbia River segment between the Canadian border and tailrace of Grand Coulee Dam.

Pros – easier assessment, one dam owner, one state, no cumulative effects complexity, possible use of "measurement model", feasible options for improved ops, small UAA scope, puts state in "issuance" role

Cons – requires modification of MOA with states, limited geographic scope, concerns about applicability of 1D model, knowledge that WQS at Coulee tailrace not as stringent as requirements from original TMDL (due to cumulative impacts), potential added complexity if targets set within impoundment and not just tailrace

Alternatives

(1) continue to develop this TMDL as basinwide Columbia and Snake TMDL

Pros – covers all listed waters, work already begun
Cons – multiple states, multiple dam owners, high data/modeling demands, and "baggage"

(2) develop a Lower Snake TMDL from Hells Canyon to confluence with Columbia

Pros – covers important Snake River segment, can include Hells Canyon
Cons – Only IPC has opportunity for temp controls, Dworshak operations are good, multiple states, multiple dam ownership

(3) develop TMDL that includes both Grand Coulee and Chief Joseph dams to cover tribal waters in that area

Pros – same as recommended proposal
Cons – no identified opportunities for changes to Chief Joe ops, multiple dam owners, cumulative effects complexity, higher data/modeling demands

Change in Columbia TMDL Paradigm

- Unlike previous TMDL, Grand Coulee TMDL would be issued by state of Washington

- Lower Snake TMDL could also be a Washington-only TMDL, depending on study area boundaries

- Other states: Idaho WQS not a driver, Oregon not interested in UAAs

Questions

- Division of Labor. Does Ecology want to write the TMDL and run the public process like any other TMDL, or continue to receive major EPA support?

- What would be the reaction of ID and OR? What do we say about long term?

- How much new technical work will be required by Ecology? What model(s) would be used – "measurement model", EPA 1D, new 2D? How much new data would be collected, organized, and considered?

EPA Resources

- EPA could offer OEA modeling and assessment support (.2 FTE) and TMDL program participation at typical level of "high priority" TMDLs

- If Ecology wants EPA to handle technical support and wants major modeling upgrades, then likely need for contract support for RBM10 database updates to the present, or development of CE-QUAL-W2 model, depending on model selection decisions (Rough cost estimate: $100,000)

- If Ecology wants EPA to draft the TMDL and major role in public process, then likely need for contract support (Rough cost estimate: $50,000)

Next Steps to Pursue the Proposed Alternative

- Meet with Ecology
- Meet with WA, OR, and ID

- Meet with Bureau
- Meet with Bureau and Corps